
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
:
v. : Mag. No. 25-14009 (RLS)
:
JONY REYNALDO ALVAREZ-BENITEZ :

I, Ellen Chao, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

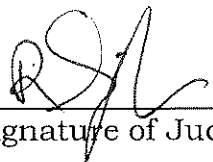
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Ellen Chao
Ellen Chao
Deportation Officer
U.S. Department of Homeland
Security
Immigration and Customs
Enforcement

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1 on April 11, 2025
in the District of New Jersey

HONORABLE RUKHSANAH L. SINGH
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

RECEIVED

APR 11 2025

AT 8:30 _____M
CLERK, U.S. DISTRICT COURT - DNJ

ATTACHMENT A

On a date on or after June 18, 2014 and on or before March 31, 2025, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JONY REYNALDO ALVAREZ-BENITEZ,

being an alien who was deported and removed and had departed the United States while an order of deportation and removal was outstanding, without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter, and on or about March 31, 2025, was found in, the United States.

In violation of Title 8, United States Code, Section 1326(a).

ATTACHMENT B

I, Ellen Chao, am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. The defendant, JONY REYNALDO ALVAREZ-BENITEZ ("ALVAREZ-BENITEZ"), is a native and citizen of Honduras, and is not a citizen of the United States.

2. On or about June 13, 2014, the Department of Homeland Security detained ALVAREZ-BENITEZ in or around McAllen, Texas, near the United States border with Mexico, for entering the United States without having in his possession immigration documents allowing him to enter or remain in the United States legally. On or about June 18, 2014, ALVAREZ-BENITEZ was removed from the United States to Honduras pursuant to an order of expedited removal under 8 U.S.C. § 1225(b)(1) issued by a United States immigration officer.

3. Following his removal, ALVAREZ-BENITEZ knowingly and voluntarily re-entered the United States without permission on an unknown date at an unknown location.

4. In or around March 2025, ICE became aware of ALVAREZ-BENITEZ's presence in or around the District of New Jersey and, on or about March 25, 2025, ICE issued a Form I-205, Warrant of Removal/Deportation, concerning ALVAREZ-BENITEZ (the "March 25, 2025 Warrant").

5. On or about March 31, 2025, ICE identified and arrested ALVAREZ-BENITEZ in Mercer County, New Jersey, during a motor vehicle stop, pursuant to the March 25, 2025 Warrant.

6. A fingerprint analysis revealed that ALVAREZ-BENITEZ is the same individual who was removed on or about June 18, 2014, as set forth in paragraph 2, and who was arrested on March 31, 2025, as set forth in paragraph 5.

7. Neither the Secretary of Homeland Security nor the Attorney General of the United States expressly consented to ALVAREZ-BENITEZ's reapplication for admission to the United States prior to his reembarkation at a place outside the United States, or to his reentry into the United States.